

STATEMENT OF BASIS

as required by LAC 33:IX.3109, for draft Louisiana Pollutant Discharge Elimination System Permit No. LA0038253; AI 43989; PER20040001 to discharge to waters of the State of Louisiana as per LAC 33:IX.2311.

The permitting authority for the Louisiana Pollutant Discharge Elimination System (LPDES) is:

Louisiana Department of Environmental Quality
Office of Environmental Services
P. O. Box 4313
Baton Rouge, Louisiana 70821-4313

- I. **THE APPLICANT IS:** Town of Winnsboro
Winnsboro Industrial Park
Post Office Box 270
Winnsboro, LA 71295
- II. **PREPARED BY:** Todd Franklin
- DATE PREPARED:** June 6, 2006
- III. **PERMIT ACTION:** reissue LPDES permit LA0038253, AI 43989; PER20040001
- LPDES application received: June 15, 2004
- EPA has not retained enforcement authority.
- LPDES permit effective: October 1, 1999
LPDES permit expired: September 30, 2004

IV. **FACILITY INFORMATION:**

- A. The application is for the discharge of treated sanitary wastewater from a publicly owned treatment works serving the Winnsboro Industrial Park.
- B. The permit application does not indicate the receipt of categorical industrial wastewater.
- C. The facility is located on LA Highway 15, 1.5 miles north of Winnsboro, Franklin Parish.
- D. 100,000 GPD extended aeration treatment plant. Disinfection is by ultraviolet light.
- E. Outfall 001

Discharge Location: Latitude 32° 11' 45" North
 Longitude 91° 43' 27" West

Description: treated sanitary wastewater

Design Capacity: 0.1 MGD

Type of Flow Measurement which the facility is currently using:

V-Notch Weir with a Continuous Stevens Recorder

V. RECEIVING WATERS:

The discharge is into an unnamed ditch; thence into Turkey Creek in segment 080906 of the Ouachita River Basin. This segment is listed on the 303(d) list of impaired waterbodies.

The designated uses and degree of support for Segment 080906 of the Ouachita River Basin are as indicated in the table below^{1/}:

Overall Degree of Support for Segment	Degree of Support of Each Use						
	Primary Contact Recreation	Secondary Contact Recreation	Propagation of Fish & Wildlife	Outstanding Natural Resource Water	Drinking Water Supply	Shell fish Propagation	Agriculture
Partial	Full	Full	Not Supported	N/A	N/A	N/A	Full

^{1/}The designated uses and degree of support for Segment 080906 of the Ouachita River Basin are as indicated in LAC 33:IX.1123.C.3, Table (3) and the 2004 Water Quality Management Plan, Water Quality Inventory Integrated Report, Appendix A, respectively.

VI. ENDANGERED SPECIES:

The receiving waterbody, Subsegment 080906 of the Ouachita River Basin, is not listed in Section II.2 of the Implementation Strategy as requiring consultation with the U. S. Fish and Wildlife Service (FWS). This strategy was submitted with a letter dated October 21, 2005, from Watson (FWS) to Gautreaux (LDEQ). Therefore, in accordance with the Memorandum of Understanding between the LDEQ and the FWS, no further informal (Section 7, *Endangered Species Act*) consultation is required. It was determined that the issuance of the LPDES permit is not likely to have an adverse effect on any endangered or candidate species or the critical habitat. The effluent limitations established in the permit ensure protection of aquatic life and maintenance of the receiving water as aquatic habitat.

VII. HISTORIC SITES:

The discharge is from an existing facility location, which does not include an expansion beyond the existing perimeter. Therefore, there should be no potential effect to sites or properties on or eligible for listing on the National Register of Historic Places, and in accordance with the 'Memorandum of Understanding for the Protection of Historic Properties in Louisiana Regarding LPDES Permits' no consultation with the Louisiana State Historic Preservation Officer is required.

VIII. PUBLIC NOTICE:

Upon publication of the public notice, a public comment period shall begin on the date of publication and last for at least 30 days thereafter. During this period, any interested persons may submit written comments on the draft permit modification and may request a public hearing to clarify issues involved in the permit decision at this Office's address on the first page of the statement of basis. A request for a public hearing shall be in writing and shall state the nature of the issues proposed to be raised in the hearing.

Public notice published in:

Local newspaper of general circulation

Office of Environmental Services Public Notice Mailing List

For additional information, contact:

Mr. Todd Franklin
Permits Division
Department of Environmental Quality
Office of Environmental Services
P. O. Box 4313
Baton Rouge, Louisiana 70821-4313

IX.

PROPOSED PERMIT LIMITS:

Subsegment 080906, Turkey Creek-From Turkey Creek Cutoff to Turkey Creek Lake, is listed on LDEQ's Final 2004 303(d) List as impaired for organic enrichment/Low DO. To date no TMDLs have been completed for this waterbody. A reopener clause will be established in the permit to allow for the requirement of more stringent effluent limitations and requirements as imposed by a TMDL. Until completion of TMDLs for this subsegment, those suspected causes for impairment which are not directly attributed to the sanitary wastewater point source category have been eliminated in the formulation of effluent limitations and other requirements of this permit. Additionally, suspected causes of impairment which could be attributed to pollutants which were not determined to be discharged at a level which would cause, have the reasonable potential to cause or contribute to an excursion above any present state water quality standard were also eliminated.

Organic Enrichment / Low DO

To protect against the potential for discharges of oxygen consuming pollutants that could cause instream DO problems and for discharges of organic materials at levels exceeding state water quality standards, CBOD₅ limits and NH₃-N reporting have been established in the permit.

Final Effluent Limits:

OUTFALL 001

Final limits shall become effective on the effective date of the permit and expire on the expiration date of the permit.

Effluent Characteristic	Monthly Avg. (lbs./day)	Monthly Avg.	Weekly Avg.	Basis
CBOD ₅	8	10 mg/l	15 mg/l	Limits are set in accordance with the Statewide Sanitary Effluent Limitations Policy (SSELP) for facilities of this size.

Effluent Characteristic	Monthly Avg. (lbs./day)	Monthly Avg.	Weekly Avg.	Basis
TSS	13	15 mg/l	23 mg/l	Since there is no numeric water quality criterion for TSS, and in accordance with the current Water Quality Management Plan, the TSS effluent limitations shall be based on a case-by-case evaluation of the treatment technology being utilized at a facility. Therefore, a Technology Based Limit has been established through Best Professional Judgement for the type of treatment technology utilized at this facility.
NH ₃ -N	Report	Report (mg/l)	Report (mg/l)	Because the receiving waterbody is impaired for organic enrichment/low DO, a NH ₃ -N reporting requirement is proposed for this facility for information gathering purposes.

Other Effluent Limitations:

1) Fecal Coliform

The discharge from this facility is into a water body which has a designated use of Primary Contact Recreation. According to LAC 33:IX.1113.C.5.b.i, the fecal coliform standards for this water body are 200/100 ml and 400/100 ml. Therefore, the limits of 200/100 ml (Monthly Average) and 400/100 ml (Weekly Average) are proposed as Fecal Coliform limits in the permit. These limits are being proposed through Best Professional Judgement in order to ensure that the water body standards are not exceeded, and due to the fact that existing facilities have demonstrated an ability to comply with these limitations using present available technology.

2) pH

According to LAC 33:IX.3705.A.1., POTW's must treat to at least secondary levels. Therefore, in accordance with LAC 33:IX.5905.C., the pH shall not be less than 6.0 standard units nor greater than 9.0 standard units at any time.

3) Solids and Foam

There shall be no discharge of floating solids or visible foam in other than trace amounts in accordance with LAC 33:IX.1113.B.7.

X. PREVIOUS PERMITS:

LPDES Permit No. LA0038253: Issued: October 1, 1999
Expired: September 30, 2004

<u>Effluent Characteristic</u>	<u>Discharge Limitations</u>		<u>Monitoring Requirements</u>	
	<u>Daily Avg.</u>	<u>Daily Max.</u>	<u>Measurement Frequency</u>	<u>Sample Type</u>
Flow	Report	Report	Continuous	Recorder
BOD ₅	10 mg/l	15 mg/l	2/month	Grab
TSS	15 mg/l	23 mg/l	2/month	Grab
Fecal Coliform				
Colonics/100 ml	200	400	1/week	Grab
pH	Range (6.0 su – 9.0 su)		1/week	Grab

XI. ENFORCEMENT AND SURVEILLANCE ACTIONS:

A) Inspections

A review of the files indicates the following most recent inspection performed for this facility.

Date – September 20, 2005
Inspector - LDEQ
Findings and/or Violations -

1. Facility consists of a fenced above ground mechanical plant. The facility currently needs new blowers to aerate system. Duckweed covers the STP and basically it now serves as a duckweed pond system. The effluent was very clear with no odor. Chlorine is used.
2. The discharge permit was effective on 10/1/1999. LDEQ issued letter on 5/12/2004, stating failure of timely renewal. Application received on 6/22/2004. Additional Information received on 7/2/2004. Completeness determination made on 7/12/2004.
3. Records and reports made available. DMRs and noncompliance letters submitted. There was a flow log for Stevens flow meter. Lab Analyses performed by Southern Diagnostic Lab.

B) Compliance and/or Administrative Orders

A review of the files indicates the following most recent enforcement action administered against this facility:

LDEQ Issuance:
Warning Letter
Enforcement Tracking No. WE-L-05-0557
Date Issued – December 28, 2005

Warning Letter was issued due to an inspection on September 20, 2005.

C) DMR Review

A review of the discharge monitoring reports for the period beginning December 2003 through November 2005 has revealed the following violations (please note that DMRs for the months of June 2004, November 2004, and March 2005 were missing from the file):

Parameter	Outfall	Period of Excursion	Permit Limit	Reported Quantity
TSS, Monthly Avg.	001	December 2003	15 mg/l	19.20 mg/l
BOD ₅ , Monthly Avg.	001	January 2004	10 mg/l	16.4 mg/l
BOD ₅ , Weekly Avg.	001	January 2004	15 mg/l	20.7 mg/l
TSS, Monthly Avg.	001	February 2004	15 mg/l	22.70 mg/l
TSS, Weekly Avg.	001	February 2004	23 mg/l	26.20 mg/l
BOD ₅ , Monthly Avg.	001	March 2004	10 mg/l	11.7 mg/l
BOD ₅ , Monthly Avg.	001	April 2004	10 mg/l	10.25 mg/l
TSS, Monthly Avg.	001	April 2004	15 mg/l	20.65 mg/l
TSS, Weekly Avg.	001	April 2004	23 mg/l	25.60 mg/l
TSS, Monthly Avg.	001	May 2004	15 mg/l	17.25 mg/l
BOD ₅ , Monthly Avg.	001	July 2004	10 mg/l	10.20 mg/l
BOD ₅ , Monthly Avg.	001	August 2004	10 mg/l	12.75 mg/l
Fecal Coliform, Monthly Avg.	001	April 2005	200 cfu/100 ml	<451 cfu/100 ml
Fecal Coliform, Weekly Avg.	001	April 2005	400 cfu/100 ml	900 cfu/100 ml
BOD ₅ , Monthly Avg.	001	August 2005	10 mg/l	11.70 mg/l
BOD ₅ , Monthly Avg.	001	October 2005	10 mg/l	14.70 mg/l
BOD ₅ , Weekly Avg.	001	October 2005	15 mg/l	24.0 mg/l

XII. ADDITIONAL INFORMATION:

The Department of Environmental Quality reserves the right to impose more stringent discharge limitations and/or additional restrictions as a result of the future TMDL. Therefore, prior to upgrading or expanding this facility, the permittee should contact the Department to determine the status of the work being done to establish future effluent limitations and additional permit conditions.

Final effluent loadings (i.e. lbs/day) have been established based upon the permit limit concentrations and the design capacity of 0.1 MGD.

Effluent loadings are calculated using the following example:

$$\text{BOD}_5: 8.34 \text{ lb/gal} \times 0.1 \text{ MGD} \times 10 \text{ mg/l} = 8 \text{ lb/day}$$

At present, the Monitoring Requirements, Sample Types, and Frequency of Sampling as shown in the permit are standard for facilities of flows between 0.10 and 0.50 MGD.

Effluent Characteristics

Monitoring Requirements

Flow
 BOD₅
 Total Suspended Solids
 Fecal Coliform Bacteria
 pH
 NH₃-N

<u>Measurement Frequency</u>	<u>Sample Type</u>
Continuous	Recorder
2/month	Grab
2/month	Grab
2/month	Grab
2/month	Grab
1/quarter	Grab

Pretreatment Requirements

Based upon consultation with LDEQ pretreatment personnel, general pretreatment language will be used due to the lack of either an approved or required pretreatment program.

Pollution Prevention Requirements

The permittee shall institute or continue programs directed towards pollution prevention. The permittee shall institute or continue programs to improve the operating efficiency and extend the useful life of the facility. The permittee will complete an annual Environmental Audit Report each year for the life of this permit according to the schedule below. The permittee will accomplish this requirement by completing an Environmental Audit Form which has been attached to the permit. All other requirements of the Municipal Wastewater Pollution Prevention Program are contained in Part II of the permit.

The audit evaluation period is as follows:

Audit Period Begins	Audit Period Ends	Audit Report Completion Date
Effective Date of Permit	12 Months from Audit Period Beginning Date	3 Months from Audit Period Ending Date

XIII**TENTATIVE DETERMINATION:**

On the basis of preliminary staff review, the Department of Environmental Quality has made a tentative determination to reissue a permit for the discharge described in this Statement of Basis.

XIV**REFERENCES:**

Louisiana Water Quality Management Plan / Continuing Planning Process, Vol. 8, "Wasteload Allocations / Total Maximum Daily Loads and Effluent Limitations Policy," Louisiana Department of Environmental Quality, 2005.

Louisiana Water Quality Management Plan / Continuing Planning Process, Vol. 5, "Water Quality Inventory Section 305(b) Report," Louisiana Department of Environmental Quality, 1998.

Louisiana Administrative Code, Title 33 - Environmental Quality, Part IX - Water Quality Regulations, Chapter 11 - "Louisiana Surface Water Quality Standards," Louisiana Department of Environmental Quality, 2004.

Louisiana Administrative Code, Title 33 - Environmental Quality, Part IX - Water Quality Regulations, Subpart 2 - "The LPDES Program," Louisiana Department of Environmental Quality, 2004.

Low-Flow Characteristics of Louisiana Streams, Water Resources Technical Report No. 22, United States Department of the Interior, Geological Survey, 1980.

Index to Surface Water Data in Louisiana, Water Resources Basic Records Report No. 17, United States Department of the Interior, Geological Survey, 1989.

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